

044850/04887/LRL

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

GRANT MCBRIDE,

Plaintiff,

v.

SELINA J. TRAVIOLI and JBS
CARRIERS, INC. A Wisconsin Corporation

Defendants.

No. 19-cv-651

NOTICE OF REMOVAL TO FEDERAL COURT

NOW COMES the Defendants, SELINA J. TRAVIOLI and JBS CARRIERS, INC., by their attorneys, Lara R. Lickhalter of CASSIDAY SCHADE LLP, and pursuant to 28 U.S.C. 1332, 1441, and 1446, remove this lawsuit from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division. In support of its Petition for Removal, Defendant states as follows:

1. The ground for Defendant's Notice of Removal is subject matter jurisdiction based on diversity of citizenship as established in 28 U.S.C. 1332.
2. Plaintiff GRANT MCBRIDE filed a complaint at law in the Circuit Court of Cook County on December 20, 2018. (A copy of Plaintiff's Complaint at Law is attached hereto as Exhibit A.)
3. Plaintiff alleges in his Complaint that Grant McBride sustained injury following a motor vehicle collision in Lemont Township, Illinois on December 24, 2016 involving Defendants JBS Carriers, Inc. and Selina Travioli.
4. Plaintiff obtained service on Defendant JBS Carriers, Inc. on January 2, 2019. (A copy of the Dane County Sheriff Office Certification is attached as Exhibit B.)

5. Plaintiff obtained service on Defendant Selina Travioli on January 12, 2019. (A copy of the Officer Certificate is attached as Exhibit C.)
6. Accordingly, this Notice of Removal was filed within 30 days of “the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.” 28 U.S.C. 1446(b).
7. Plaintiff’s case is worth an amount sought sufficient to meet the jurisdictional amount of \$75,000 as required by 28 U.S.C. § 1332, as Plaintiff’s addendum seeks an amount in excess of \$100,000, which is in excess of the jurisdictional minimums.
8. Upon information and belief, at the time this action was commenced, and since then, Plaintiff Grant McBride has been a citizen of the State of Illinois.
9. Defendant JBS Carriers, Inc. is a foreign corporation with its principal place of business in Greeley, Colorado. (See Colorado Secretary of State Business Entity Detail, attached as Exhibit D.)
10. At the time this action was commenced, and since then, Defendant Selina Travioli has been a citizen of the State of Michigan.
11. Diversity of citizenship therefore exists among the Parties.
12. Based on the foregoing, this court has subject matter jurisdiction over Plaintiff’s claims pursuant to 28 U.S.C.A. § 1332(a) because this is a civil action, in which the amount in controversy exceeds \$75,000.00 and all parties are citizens of different states.

13. As required by 28 U.S.C. 1446(d), Defendants will promptly serve upon Plaintiff's counsel, and file with the Clerk of the Circuit Court of Cook County, a true and correct copy of this Notice.
14. By removing this action, Defendant does not waive any defenses available to him.
15. If any question arises as to the propriety of the removal of this action, Defendant requests the opportunity to present a brief and oral argument in support of its position that this case is removable.
16. This Notice is signed in compliance with Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, Defendants, SELINA J. TRAVIOLI and JBS CARRIERS, INC., prays that this Honorable Court retain jurisdiction of this matter pursuant to 28 U.S.C. 1332, 1441 and 1446.

Respectfully submitted,

/s/Lara R. Lickhalter

Lara R. Lickhalter – Bar Number: 6306444

CASSIDAY SCHADE LLP

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